

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE US, INC., T-MOBILE USA,
INC., and SPRINT CORP.,

Defendants.

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE US, INC., T-MOBILE USA,
INC., and SPRINT CORP.,

Defendants.

Civil Action No. 2:23-cv-00379-JRG-RSP

(Lead Case)

JURY DEMANDED

Civil Action No. 2:23-cv-00377-JRG-RSP

(Member Case)

JURY DEMANDED

**JOINT MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants T-Mobile USA, Inc. (“T-Mobile USA”), T-Mobile US, Inc. (“T-Mobile US”), and Sprint Corp. (“Sprint”) (collectively, “T-Mobile” or “Defendants”),¹ (all together, the “Parties”) hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

¹ Defendants assert that T-Mobile US, Inc. is not a proper party to this lawsuit and is not subject to personal jurisdiction in this District, such that this order only binds the other named defendants.

Dated: December 29, 2023

/s/ Katherine Q. Dominguez

Katherine Q. Dominguez
(NY Bar No. 4741237)
kdominguez@gibsondunn.com
Josh A. Krevitt
(NY Bar No. 2568228)
jkrevitt@gibsondunn.com
Brian Rosenthal
(NY Bar No. 3961380)
brosenthal@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

Robert Vincent
rvincent@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, Texas 75201-2923
Telephone: (214) 698-3100
Facsimile: (214) 571-2900

Andrew W. Robb
(CA Bar No. 291438)
arobb@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
310 University Ave
Palo Alto, CA 94301
Telephone: (650) 849-5300

Melissa R. Smith
melissa@gillamsmithlaw.com
GILLIAM & SMITH, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257

Attorneys for Defendants

/s/ Marc Fenster

Marc Fenster
CA State Bar No. 181067
Email: mfenster@raklaw.com
Reza Mirzaie
CA State Bar No. 246953
Email: rmirzaie@raklaw.com
Brian Ledahl
CA State Bar No. 186579
Email: bledahl@raklaw.com
Ben Wang
CA State Bar No. 228712
Email: bwang@raklaw.com
Dale Chang
CA State Bar No. 248657
Email: dchang@raklaw.com
Paul Kroeger
CA State Bar No. 229074
Email: pkroeger@raklaw.com
Neil A. Rubin
CA State Bar No. 250761
Email: nrubin@raklaw.com
Kristopher Davis
CA State Bar No. 329627
Email: kdavis@raklaw.com
James S. Tsuei
CA State Bar No. 285530
Email: jtsuei@raklaw.com
Philip Wang
CA State Bar No. 262239
Email: pwang@raklaw.com
Amy Hayden
CA State Bar No. 287026
Email: ahayden@raklaw.com
Jason M. Wietholter
CA State Bar No. 337139
Email: jwietholter@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Blvd. 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 29th day of December 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster